



U.S. Department of Justice

United States Attorney  
Southern District of New York

The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007

January 26, 2023

**BY EMAIL**

**REQUEST FILING UNDER SEAL**

Honorable Colleen McMahon  
United States District Judge  
Southern District of New York  
Daniel Patrick Moynihan Courthouse  
500 Pearl Street  
New York, New York 10007

Re: *United States v. Rafat Amirov, et al.*,  
S4 22 Cr. 438 (CM)

Dear Judge McMahon:

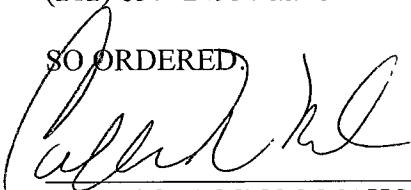
The Government respectfully submits this letter to request an order unsealing the enclosed, sealed, superseding indictment, S4 22 Cr. 438 (CM) (the "Indictment"), at and as of 10:30 a.m. on January 27, 2023, in connection with the presentment and arraignment of defendant Rafat Amirov. The Indictment was filed under seal on January 24, 2023. Amirov arrived in the district earlier today, and will be presented and arraigned on the charges in the Indictment tomorrow. We respectfully request that this unsealing request be granted in order to provide the Indictment to the defendant and his counsel, and to conduct the presentment and arraignment. The Government requests that the Indictment remain under seal until that time in order to prevent the premature public disclosure of the charges and detailed allegations in the Indictment. The Government also requests that this letter be filed under seal in the first instance, and that it be unsealed simultaneously with the Indictment.

Respectfully submitted,

DAMIAN WILLIAMS  
United States Attorney

By: /s/  
Michael D. Lockard / Matthew J.C. Hellman  
/ Jacob H. Gutwillig  
Assistant United States Attorneys  
(212) 637-2193 / 2278 / 2215

Encl.

SO ORDERED,  
  
HON. COLLEEN McMAHON

1-26-2023